

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

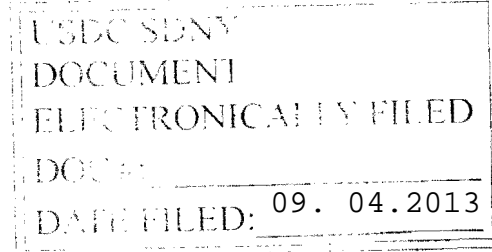
CYNTHIA DIBARTOLO,

Plaintiff,

- against -

ABBOTT LABORATORIES,

Defendant.



Case No. 1:12-cv-00900-NRB

ECF Case

**JOINT SCHEDULING  
PROPOSAL AND ORDER**

At the February 6, 2013 scheduling conference, the Court determined that resolution of expert causation issues should precede fact discovery in this matter. At plaintiff's request, the Court subsequently granted leave for plaintiff to take one 3.5-hour Rule 30(b)(6) deposition before the disclosure of her expert causation reports. That deposition was completed on August 26, 2013. The Court has now directed the parties to submit a proposed scheduling order, to include briefing deadlines.

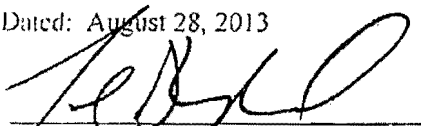
Counsel for plaintiff and defendant have conferred, and hereby stipulate and agree that the following shall constitute the schedule for the parties' designation of general and specific causation experts, service of expert reports, completion of expert depositions, and the deadlines for *Daubert* briefing, unless further amended by agreement of the parties and the Court:

Event	Deadline
Designation of Plaintiff's General and Specific Causation Experts and Service of Plaintiff's General and Specific Causation Expert Reports	September 25, 2013
Designation of Defendant's General and Specific Causation Experts and Service of Defendant's General and Specific Causation Expert Reports	October 25, 2013

J.

Event	Deadline
Completion of General and Specific Causation Expert Depositions	November 25, 2013
Deadline to File <i>Daubert</i> Motions on General and Specific Causation Experts	December 24, 2013
Deadline to File Oppositions to <i>Daubert</i> Motions on General and Specific Causation Experts	January 14, 2014
Deadline to File Replies in Support of <i>Daubert</i> Motions on General and Specific Causation Experts	January 28, 2014

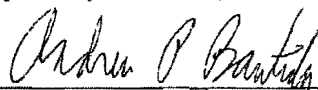
Dated: August 28, 2013



Arnold A. Vickery  
 Fred H. Shepherd  
 THE VICKERY LAW FIRM  
 10000 Memorial Dr., Suite 888  
 P.O. Box 4340  
 Houston, Texas 77210-4340  
 713-526-1100  
 713-523-5939 (fax)  
 andy@justiceseekers.com  
 fred@justiceseekers.com

Counsel for Plaintiff

Respectfully submitted,



Jay P. Lefkowitz, P.C.  
 Steven J. Menashi  
 Dmitriy G. Tishyevich  
 KIRKLAND & ELLIS LLP  
 601 Lexington Ave.  
 New York, New York 10022  
 Telephone: (212) 446-4800  
 Facsimile: (212) 446-4900

Michael P. Foradas, P.C.  
 Renee D. Smith  
 Andrew P. Bautista  
 KIRKLAND & ELLIS LLP  
 300 N. LaSalle  
 Chicago, IL 60654  
 Telephone: (312) 862-2000  
 Facsimile: (312) 862-2200

Counsel for Defendant Abbott Laboratories

SO ORDERED:



Honorable Naomi Reice Buchwald  
 United States District Judge

